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13 Attorneys for Plaintiff Sony Corporation

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA  
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13 SONY CORPORATION,

14 Plaintiff,

15 v.

16 VIZIO, INC.,

17 Defendant.  
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CASE NO. CV 08-01135-RGK (FMOx)

**DISCOVERY MATTER**

**DECLARATION OF TODD KENNEDY  
IN SUPPORT OF JOINT STIPULATION  
REGARDING SONY CORPORATION'S  
MOTION TO COMPEL A FURTHER  
RESPONSE TO SONY INTERROGATORY  
NOS. 11 AND 14.**

**Magistrate Judge: Hon. Fernando M. Olguin**

**Discovery Cut-Off Date:** November 1, 2009

**Pretrial Conference Date:** January 10, 2010

**Trial Date:** January 26, 2010

1           1.       I am an attorney with the law firm of Quinn Emanuel Urquhart Oliver  
2     & Hedges, LLP, counsel for Sony Corporation ("Sony"). I submit this declaration  
3     in support of Sony and Vizio's Joint Stipulation Regarding Sony Corporation's  
4     Motion to Compel a Further Response to Sony's Interrogatory Nos. 11 and 14. I  
5     have personal knowledge of the facts stated in this declaration, and if called upon to  
6     do so, could and would competently testify thereto.

7           2.       Although some of Vizio's televisions have user manuals that confirm  
8     the television's compliance with HDCP rev. 1.3, most of the user manuals identified  
9     in Vizio's Attachment A do not even mention the HDCP rev. 1.3 standard.

10          3.       Although some manuals contain pictures of transparent menus, many of  
11     the manuals do not contain any such pictures.

12          4.       Attached as Exhibit 1 is a true and correct copy of Sony's First Set of  
13     Interrogatories to Vizio, dated March 23, 2009.

14          5.       Attached as Exhibit 2 is a true and correct copy of the April 6, 2009  
15     Order for Jury Trial (Docket No. 48).

16          6.       Attached as Exhibit 3 is a true and correct copy of a letter from Todd  
17     Kennedy to James L. Wamsley III, dated April 29, 2009.

18          7.       Attached as Exhibit 4 is a true and correct copy of a letter from Peter A.  
19     Klivans to Ryan McCrum, dated May 7, 2009.

20          8.       Attached as Exhibit 5 is a true and correct copy of the transcript of the  
21     parties' May 11, 2009 conference of counsel.

22          9.       Attached as Exhibit 6 is a true and correct copy of the transcript of the  
23     parties' June 22, 2009 conference of counsel.

24          10.       Attached as Exhibit 7 is a true and correct copy of a document  
25     produced in this case bearing production numbers SONY0005632-721.

26          11.       Attached as Exhibit 8 is a true and correct copy of a letter from Ryan B.  
27     McCrum to Todd Kennedy, dated May 6, 2009.

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1           12. Attached as Exhibit 9 is a true and correct copy of a document  
2 produced in this case bearing production numbers V0000027579-622.

3           13. Attached as Exhibit 10 is a true and correct copy of a letter from Ryan  
4 B. McCrum to Todd Kennedy, dated June 19, 2009.

5           14. Attached as Exhibit 11 is a true and correct copy of a letter from Todd  
6 Kennedy to Ryan McCrum, dated June 12, 2009.

7           15. Attached as Exhibit 12 is a true and correct copy of a letter from Ryan  
8 McCrum to Todd Kennedy, dated May 20, 2009.

9           16. Attached as Exhibit 13 is a true and correct copy of U.S. Patent No.  
10 5,751,373.

11           17. Attached as Exhibit 14 is a true and correct copy of an exhibit to  
12 Vizio's July 2, 2009 First Supplemental Response to Sony's Second Set of  
13 Interrogatories, entitled "Invalidity Claim Chart for U.S. Patent No. 5,751,373."

14           18. Attached as Exhibit 15 is a true and correct copy of an exhibit to  
15 Vizio's July 2, 2009 First Supplemental Response to Sony's Second Set of  
16 Interrogatories, entitled "Invalidity Claim Chart for U.S. Patent No. 5,583,577."

17           19. Attached as Exhibit 16 is a true and correct copy of an exhibit to  
18 Vizio's July 2, 2009 First Supplemental Response to Sony's Second Set of  
19 Interrogatories, entitled "Invalidity Claim Chart for U.S. Patent No. 5,684,542."

20           20. Attached as Exhibit 17 is a true and correct copy of a document  
21 produced in this case bearing production numbers V0000005214-68.

22           21. Attached as Exhibit 18 is a true and correct copy of a document  
23 produced in this case bearing production numbers V0000080972-73.

24           22. Attached as Exhibit 19 is a true and correct copy of a document  
25 produced in this case bearing production numbers V0000005142-5213.

26           23. Attached as Exhibit 20 is a true and correct copy of the rough draft of  
27 the transcript of the parties' July 17, 2009 conference of counsel.  
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1 DATED: August 7, 2009

QUINN EMANUEL URQUHART OLIVER &  
HEDGES. LLP

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4 Bv

  
Todd Kennedy  
Attorney for Plaintiff SONY  
CORPORATION

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